

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

Carroll Independent School District,

Plaintiff,

v.

United States Department of Education, et al.,

Defendants.

Case No. 4:24-cv-00461-O
District Judge Reed C. O'Connor

UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMIT

1. Pending before the Court is Plaintiff's motion for summary judgment. *See* ECF No. 58.

2. Pursuant to the parties' joint notice outlining schedule for expedited resolution, *see* ECF No. 56, this Court ordered Defendants to file a combined motion for summary judgment, memorandum in support, and response to Plaintiff's motion for summary judgment, limited to 40 pages. *See* ECF No. 57.

3. Defendants respectively request leave to exceed the 40-page limit for their combined filing to 50 pages. In addition to responding Plaintiff's motion and cross moving for summary judgment, Defendants' combined filing will cross move to dismiss based on grounds not addressed in Plaintiff's motion. As such, a 10-page extension is warranted to allow Defendants to effectively combine their response to Plaintiff's motion, cross move for summary judgment, and cross move to dismiss.

4. Defendants' counsel conferred with Plaintiff's counsel, and Plaintiff consents to the request.

5. A proposed order is attached.

Dated: August 30, 2024

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

EMILY B. NESTLER
Assistant Branch Director

/s/ Pardis Gheibi

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Attorney for Defendants

CERTIFICATE OF CONFERENCE

I certify that on August 30, 2024, I conferred by email with Mathew Hoffman, counsel for Plaintiff, and Mr. Hoffman informed me that “Plaintiff consents” to the relief requested in the above motion.

/s/ Pardis Gheibi

CERTIFICATE OF SERVICE

I hereby certify that on August 30, 2024, I electronically filed this document with the Court by using the CM/ECF system, and that this document was distributed via the Court’s CM/ECF system.

/s/ Pardis Gheibi